

# **GREENLEAF HEALTH**

## **MEDICAL DEVICE & COMBINATION PRODUCTS CAPABILITIES**

**OUR EXPERIENCE.  
YOUR SUCCESS.**

Greenleaf Health is a leading FDA regulatory consulting firm guiding companies through the changing FDA landscape.

# ABOUT GREENLEAF HEALTH

**300 YEARS**  
OF FDA EXPERIENCE



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## WHY GREENLEAF

Founded in 2007, Greenleaf Health is a leading FDA regulatory consulting firm that provides strategic and technical guidance to pharmaceutical, biotechnology, and medical device companies researching, developing, and manufacturing innovative solutions to pressing global public health challenges.

Greenleaf's robust blend of technical skill and FDA institutional knowledge enables the firm to provide reliable, objective guidance to companies developing medical products for the U.S. market.

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## UNMATCHED EXPERTISE

Greenleaf's team brings unmatched expertise that companies need when navigating today's evolving FDA regulatory environment. The firm includes former leaders and regulatory professionals from the FDA, Capitol Hill, top global pharmaceutical and medical device companies, leading law firms, and the U.S. biotechnology trade organization.

Greenleaf experts draw on a combined total of more than 300 years of FDA experience and a network of technical specialists. This wealth of experience informs Greenleaf's understanding of the broad life sciences industry and allows us to deliver valuable insight throughout the product lifecycle.

# COMPREHENSIVE SERVICES



## PRODUCT QUALITY, MANUFACTURING & COMPLIANCE

Greenleaf experts identify and promote practices and procedures that will align a client's approach with the FDA's quality, safety, and compliance expectations.



## MEDICAL DEVICE & COMBINATION PRODUCTS

Greenleaf applies extensive regulatory expertise to guide clients developing medical devices or combination products from early-stage development to marketing authorization and throughout the product lifecycle.



## DRUG & BIOLOGICAL PRODUCTS

Greenleaf serves as a trusted regulatory partner, advising companies on the complex process of bringing new therapeutics to market in today's evolving FDA environment.



## COMPLIANCE AUDIT, TRAINING & REMEDIATION

Greenleaf works with a network of independent technical experts who provide comprehensive on-site compliance assessments, remediation, and inspection readiness.



## DIGITAL HEALTH SERVICES

Greenleaf experts provide guidance to clients developing, commercializing, utilizing, and investing in innovative digital health technologies as they navigate the evolving landscape of FDA digital health requirements.



## CELL & GENE THERAPY

Greenleaf assists sponsors of cell and gene therapies by optimizing FDA interactions and submissions to support product development, manufacturing, quality, compliance, and regulatory review.



## ADVISORY SERVICES

Greenleaf understands the complex environment within which life sciences transactions take place and performs in-depth regulatory risk assessments tailored to investors' needs.



## LITIGATION SUPPORT SERVICES

Greenleaf and our network of experts work closely with litigators representing FDA-regulated clients in disputes related to medical devices, drug and biological products, and product quality, manufacturing, and compliance.



## REGULATORY POLICY SERVICES

Greenleaf supports the needs of small and large clients to understand, implement, and comply with the FDA's regulatory programs and policies and to enhance patient access to products.

A woman with blonde hair tied back, wearing a light-colored top and a pearl necklace, is seated at a desk. She is looking towards a large Apple iMac computer monitor. The scene is dimly lit, with light coming from a window with blinds in the background. A green semi-transparent banner is overlaid across the middle of the image, containing the text.

# MEDICAL DEVICE & COMBINATION PRODUCT SERVICES

# MEDICAL DEVICE & COMBINATION PRODUCTS TEAM



Guided by decades of experience, Greenleaf's Medical Device and Combination Products Team provides unmatched knowledge of the life sciences regulatory process and serves as a trusted partner for companies navigating the complexities of product lifecycle management.



## DANIEL SCHULTZ, M.D.

### Principal, Medical Device & Combination Products

Former Director of the FDA's Center for Devices and Radiological Health (CDRH); 35-year career includes service as a physician, senior FDA official, and member of the U.S. Public Health Service.



## HEATHER ROSECRANS

### EVP, Medical Device & Combination Products

One of the nation's leading 510(k) experts, with an FDA career that spanned more than 30 years and included a pivotal role in developing the FDA's 510(k) program.



## MAURA NORDEN

### EVP, Medical Device & Combination Products

#### General Counsel

15 years of experience advising FDA-regulated entities, investors, and public health organizations on a broad range of FDA regulatory matters.



## MARK KRAMER

### EVP, Medical Device & Combination Products

17-year FDA career includes establishing and directing the Office of Combination Products and leading interdisciplinary review teams in CDRH.



## SAMANTHA EAKES

### VP, Regulatory Affairs

More than seven years of FDA regulatory consulting experience and a diverse background in public health, public policy, and the nonprofit sector.



## CATHERINE ROWE

### Executive Director of Operations, Medical Device & Combination Products

More than 20 years of professional experience in marketing, sales, and project management.



# MEDICAL DEVICE & COMBINATION PRODUCTS SERVICES

Greenleaf's Medical Device and Combination Products Team applies extensive FDA experience to determine the best regulatory approach for a product and develop a comprehensive strategy to achieve a successful result.



## UNMATCHED REGULATORY EXPERIENCE

Greenleaf guides clients through the complex regulatory process, from the earliest stages of product development, through the FDA review process, to marketing authorization and compliance with postmarket requirements and quality systems.



## PREMARKET REVIEW PROCESS

Greenleaf provides expert direction on scientific and regulatory strategies for clinical programs and regulatory submissions. Experts also provide recommendations and preparation for FDA meetings, including medical device advisory panel meetings, and FDA communications.



## MARKETING & PROMOTIONAL PRACTICES

Greenleaf provides strategic guidance to medical device firms on labeling requirements, promotional materials, direct-to-consumer advertising review processes, and use of social media. Experts also guide companies in remediation of untitled and warning letters.



## LITIGATION SUPPORT SERVICES

Greenleaf's deep bench of experts can offer litigators a high-level institutional knowledge of the FDA as well as more granular expertise regarding FDA regulation of a variety of product types across the product lifecycle. Greenleaf professionals have experience preparing expert declarations, drafting professional expert reports and depositions, and testifying at trial, and have worked with litigators representing FDA-regulated clients in a wide array of disputes involving complex FDA issues.



# COMBINATION PRODUCT SUPPORT SERVICES

Greenleaf provides strategic advice throughout the combination product lifecycle, including all potential premarket pathways (NDA, ANDA, BLA, PMA, 510(k), De Novo). Additionally, Greenleaf has expertise to help sponsors determine the regulatory identity (classification) of their product as a drug, device, biological product, or combination product.

## PRODUCT EXPERTISE

Our experts have extensive experience with:

- Drug-coated devices
- A wide range of drug delivery systems including subcutaneous, inhaled, injected, topical, intrathecal, and closed loop
- Designation and development of companion diagnostics
- Single-entity, co-packaged, and cross-labeled combination products

## PREMARKET STRATEGY & SUBMISSIONS

Greenleaf works with clients to support an effective and efficient development and submission process, offering:

- Preparation and assistance with requests for designation (RFDs) and pre-RFDs to determine primary mode of action (PMOA) and lead FDA Center, and strategies to influence PMOA determination in line with company's objectives
- Strategic considerations in filing single vs. separate marketing application(s) for the drug, biological product, and/or device constituent parts of a combination product
- Strategies to avoid the need for cross-labeling of constituent parts
- Advice on post-approval changes and bridging strategies
- Review of/recommendations for sufficiency of device design control documentation, including verification and validation plans, protocols, and reports for the device constituent part and combination product as a whole
- Review of/recommendations for human factors plans, protocols, and reports, including comparative use protocols for generic combination products
- Training in combination product statutory requirements, regulations, policies, and procedures
- Assessment of regulatory precedents and guidance to inform desired regulatory outcomes

## FDA INTERACTIONS

As former FDA leaders, Greenleaf consultants can provide insight and strategies to:

- Enhance communication with the FDA, including translating between "CDER speak" and "CDRH speak"
- Break logjams or obtain assistance navigating Centers
- Work effectively with the Office of Combination Products (OCP)
- Respond to FDA deficiencies to investigational/marketing applications and OCP questions on pre-RFD submissions

## CGMP & POSTMARKET COMPLIANCE

Greenleaf assists companies in complying with regulatory requirements for combination products through:

- Review of/advice on company procedures
- Advice on cGMP and postmarket reporting requirements for single-entity, co-packaged, and cross-labeled combination products, including quality system "call-out" requirements for drugs, devices, and biological products
- cGMP audits
- Training on both cGMP and postmarket reporting requirements for combination products



# DIGITAL HEALTH SERVICES

# DIGITAL HEALTH SERVICES TEAM



Greenleaf Health serves as a trusted partner to both large and small clients developing and commercializing innovative digital health technologies as they navigate the complex landscape of FDA regulations and policies. The firm's team of experts provides guidance to medical device and combination product manufacturers, pharmaceutical and biotechnology companies, trade associations, and other stakeholders implementing and complying with the FDA's digital health requirements.



## DANIEL SCHULTZ, M.D.

### Principal, Medical Device & Combination Products

Distinguished 35-year career includes service as Director of the FDA's Center for Devices and Radiological Health.



## MAURA NORDEN

### EVP, Medical Device & Combination Products

15 years of experience advising leading medical device and drug companies on FDA regulatory matters.



## BRIAN CORRIGAN

### EVP, Regulatory Policy

15+ years in the biopharmaceutical industry focused on regulatory policy development and strategic clinical development support.



## KALAH AUCHINCLOSS

### EVP, Regulatory Compliance

More than 15 years of experience on Capitol Hill, in the private sector, and at the FDA, including role as Deputy Chief of Staff.



## SEAN HILSCHER

### VP, Regulatory Policy

Deep experience in regulatory intelligence and policy analysis, with specific expertise in real-world evidence (RWE) and digital health.



## MARIA BONNER

### VP, Regulatory Compliance

Policy and legal experience in both the public and private sectors provides deep understanding of regulatory policy.



# DIGITAL HEALTH AREAS OF EXPERTISE

Greenleaf's digital health clients vary greatly in nature, scope, and levels of experience. Because there is no one-size-fits-all approach, each solution is built to fit the targeted needs of the client. Greenleaf regularly provides expertise to the following types of clients:



Start-up and mid-sized software companies developing digital health mobile apps



Drug companies entering the digital health space to enhance the patient or health care provider experience of their products



Diagnostic testing companies developing applications to read diagnostic test results



Consumer product companies entering the digital health space with limited FDA regulatory experience



Health policy and research organizations developing, tracking, and responding to digital health policies, legislation, and initiatives



Investors identifying and evaluating regulatory risks in potential digital health investments



Trade associations and global drug and medical device companies developing digital health policy strategies



Artificial intelligence (AI) program developers seeking FDA regulatory insight and clarity



Telehealth companies partnering with clinical practitioners and life science companies to offer online access to medical products



Drug and device companies using digital tools to conduct decentralized clinical trials

# DIGITAL HEALTH SERVICES



The combined knowledge and substantial qualifications of the Greenleaf team ensure best-in-class insight for companies navigating digital health regulations. Greenleaf offers the following digital health-focused services:



## REGULATORY STRATEGY & COMPLIANCE

Provide insight, clarity, and strategic consultation on digital health topics

- Advise clients on FDA regulatory policies, programs, and procedures, including questions related to jurisdiction to regulate, device classification, and potential pathways to market
- Partner with clients to design strategies for product development and premarket review
- Assist with marketing application preparation and submission
- Provide advice regarding FDA communications, including compliance and regulatory correspondence
- Advise on FDA labeling and postmarket safety requirements



## ADVISORY SERVICES

Assist entities involved in digital health technology investments and transactions

- Perform due diligence and regulatory risk assessments of potential targets
- Advise investors on opportunities to manage and mitigate risks in order to achieve desired regulatory outcomes
- Research and analyze regulatory data sources



## REGULATORY POLICY

Help clients keep pace with developments and navigate the emerging regulatory landscape

- Identify novel regulatory tools and approaches to optimize the development process
- Support clients in structuring their regulatory policy capabilities to effectively advance priorities
- Design and implement strategies that engage stakeholders, leverage alliances, and advance regulatory policy



# REGULATORY POLICY SERVICES

# REGULATORY POLICY SERVICES TEAM

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Greenleaf's Regulatory Policy Services Team offers a rare blend of perspectives developed as leaders in both the public and private sectors. This wealth of experience equips clients with a trusted partner when seeking guidance on implementing, complying with, and communicating about FDA regulatory policy.

The team's areas of expertise include:

- Insight into FDA regulatory policy, including novel programs
- Regulatory intelligence and scientific policy
- Effective communication on regulatory policy issues
- Product designations and access to expedited programs
- Regulatory issues arising both pre and post market
- Building client capacity and understanding of regulatory policy issues



## STEPHEN MASON

### Executive Vice President, Regulatory Policy

Accomplished and diverse career of 20+ years specializing in regulatory and legislative policy development and analysis.



## SEAN HILSCHER

### Vice President, Regulatory Policy

Deep experience in regulatory intelligence and policy analysis, with specific expertise in real-world evidence (RWE) and digital health.



## TANVI MEHTA

### Manager, Regulatory Affairs & Policy

Brings analytical approach to regulatory policy from background in financial services and health care business.



## RHONA BANIQUEUED

### Executive Director of Operations, Drug & Biological Products

More than 18 years of private sector marketing and project management experience.

# REGULATORY POLICY SERVICES



Regulatory policy is an essential component of the FDA regulatory landscape – it helps shape how regulators make decisions about the development, approval, and marketing of drugs, biological products, medical devices, and combination products. These policy decisions determine the feasibility of the development and use of new technologies and directly affect patient access to medical products.

Greenleaf's regulatory policy services are designed to support the needs of large and small clients as they navigate FDA regulations and regulatory policies. The firm's team of experts works cross-functionally to assist pharmaceutical and biotechnology companies, medical device manufacturers, patient groups, trade associations, and other stakeholders in communicating effectively about FDA regulatory policy issues and in understanding, implementing, and complying with the FDA's regulatory programs.



## EXPERT INSIGHT

Greenleaf's well-regarded professionals have each spent decades working in leadership roles at regulatory agencies and within regulated industry. The Regulatory Policy Services Team provides advice and recommendations based on extensive institutional knowledge of the FDA's overarching regulatory approach, as well as deep and granular expertise regarding FDA regulation of medical product types across the product lifecycle.



## TARGETED CAPABILITIES

Greenleaf offers unmatched insight on pre- and postmarket regulatory policy issues, product designations, expedited programs, regulatory intelligence, and scientific policy. Clients utilize our depth and breadth of knowledge to understand regulatory policy issues and build their capacity to implement, comply with, and communicate about FDA regulatory policy.



## COMPREHENSIVE SERVICES

Greenleaf's regulatory policy services address FDA regulations and regulatory policies to support clients' participation in FDA programs and regulatory compliance and to enhance patient access to innovative medical products.

Comprehensive services include:

- Assistance with designing and implementing regulatory policy strategies to effectively advance priorities
- Guidance on policy issues related to development programs, combination products, submissions for marketing authorization, and the postapproval phase
- Stakeholder engagement and alliance development to achieve regulatory policy goals
- User fee negotiation support, impact assessment, and program development
- Strategic regulatory guidance for sponsors seeking access to FDA programs and designations, including orphan drug, breakthrough therapy, RMAT, and other expedited pathways
- Advice on incorporating novel tools and approaches into development programs

A black and white photograph of three business professionals in an office setting. A man in a light-colored shirt is seated on the left, smiling and looking towards the other two people. A woman with blonde hair is seated in the center, also smiling. A woman with glasses and a dark blazer is seated on the right, smiling. They are gathered around a table with various office supplies, including papers, a pen holder, and a notebook. A large green banner is overlaid across the bottom half of the image, containing the text 'ADVISORY SERVICES' in white, bold, uppercase letters.

# ADVISORY SERVICES

# ADVISORY SERVICES TEAM



Greenleaf's team of advisors offers a rare blend of perspectives developed as leaders in both the public and private sectors. This wealth of experience informs Greenleaf's understanding of the broad life sciences industry and enables us to deliver valuable insight throughout the product lifecycle.



**BRIAN CORRIGAN**

**EVP, Regulatory Policy**

15+ years in the biopharmaceutical industry focused on regulatory policy development and strategic clinical development support.



**JOHN TAYLOR**

**President and Principal,  
Compliance & Regulatory Affairs**

Former FDA senior official, acting in high-profile positions at the Agency and senior leadership roles within industry.



**JOHN JENKINS, M.D.**

**Principal, Drug & Biological Products**

Former Director of the Office of New Drugs within the FDA's Center for Drug Evaluation and Research (CDER).



**BOB MEYER, M.D.**

**Principal, Drug & Biological Products**

A leader in drug and biological product lifecycle management with 30 years of regulatory and academic leadership.



**KAREN MIDTHUN, M.D.**

**Principal, Drug & Biological Products**

28-year career in public service, including as Director of the FDA's Center for Biologics Evaluation and Research (CBER), 2009-2016.



**DANIEL SCHULTZ, M.D.**

**Principal, Medical Device & Combo. Products**

35-year career includes service as a physician and as Director of the FDA's Center for Devices and Radiological Health (CDRH).



**DAVID ELDER**

**Principal, Regulatory Compliance**

23-year veteran of the FDA, with prominent roles in domestic and foreign inspections, recalls and emergencies, and compliance actions.



**SANDRA KWEDER, M.D.**

**Principal, Drug & Biological Products**

Former Deputy Director of the FDA's Office of New Drugs and Deputy Director of the FDA's Europe Office and Liaison to the EMA.



**CYNTHIA SCHNEDAR**

**Principal, Regulatory Compliance**

30-year career as a compliance expert; formerly Director of the Office of Compliance for the FDA's Center for Drug Evaluation and Research (CDER).



**KALAH AUCHINCLOSS**

**EVP, Regulatory Compliance**

More than 15 years of experience on Capitol Hill, in the private sector, and at the FDA, including role as Deputy Chief of Staff.



**MAURA NORDEN**

**EVP, Medical Device & Combo. Products**

15 years of experience advising FDA-regulated entities, investors, and public health organizations on a broad range of FDA regulatory matters.



**MARK KRAMER**

**EVP, Medical Device & Combo. Products**

17-year FDA career includes establishing and directing the Office of Combination Products and leading interdisciplinary review teams in CDRH.



# ADVISORY SERVICES

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Greenleaf's in-depth knowledge and understanding of the FDA equips clients with a trusted partner when considering life sciences transactions. Greenleaf's advisory services are more than a compilation of public data. Greenleaf goes a step further by using the firm's vast institutional knowledge to provide in-depth analyses tailored to our clients' specific needs.

The firm's multidisciplinary team uses its extensive expertise to perform risk assessments that take into account business objectives, transaction timelines, and the industry landscape. The end result is an unbiased analysis identifying a target company's key regulatory risks, likelihood of the risks materializing, potential impact on the business, and opportunities to manage and mitigate risks in order to achieve desired regulatory outcomes. Greenleaf's comprehensive due diligence services evaluate a company's pipeline, or a specific asset, in the following areas:



## PRODUCT DEVELOPMENT & REVIEW

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Analysis of the target company's regulatory filings and product development plans, including approvals and clearances, special designations, advisory committee decisions, labeling review, and investigational products.



## QUALITY MANUFACTURING

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Assessment of the target company's manufacturing practices, compliance with quality system regulations (QSRs), good manufacturing practices (GMPs), and identification of inconsistencies that may affect the regulatory risk of a product or the company.



## IDENTIFICATION OF REGULATORY RISK

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Evaluation of the target company's compliance with FDA regulations and identification of issues that may require attention and resources for remediation.



# LITIGATION SUPPORT SERVICES

# LITIGATION SUPPORT SERVICES NETWORK

The combined capabilities of Greenleaf professionals and our firm's network of FDA experts offer litigators enhanced guidance when grappling with FDA regulatory issues.



## MAURA NORDEN

**EVP, Medical Device & Combo. Products  
General Counsel**

15+ years of experience advising FDA-regulated entities, investors, and public health organizations on FDA regulatory matters.



## KALAH AUCHINCLOSS

**EVP, Regulatory Compliance  
Deputy General Counsel**

15+ years of experience on Capitol Hill, in the private sector, and at the FDA, including role as Deputy Chief of Staff.



## DANIEL SCHULTZ, M.D.

**Principal, Medical Device  
& Combo. Products**

35-year career includes service as Director of the FDA's Center for Devices and Radiological Health (CDRH).



## CYNTHIA SCHNEDAR

**Principal, Regulatory Compliance**

30-year career as a compliance expert; formerly Director of the Office of Compliance for the FDA's Center for Drug Evaluation and Research (CDER).



## DAVID ELDER

**Principal, Regulatory Compliance**

23-year veteran of the FDA, with prominent roles in domestic and foreign inspections, recalls and emergencies, and compliance actions.



## HEATHER ROSECRANS

**EVP, Medical Device  
& Combo. Products**

One of the nation's leading 510(k) experts, with an FDA career that spanned more than 30 years.



## MARK KRAMER

**EVP, Medical Device & Combo. Products**

17-year FDA career includes establishing and directing the Office of Combination Products and leading interdisciplinary review teams in CDRH.



## KATHERINE MUELLER

**Deputy General Counsel**

10+ years of legal experience in the private sector, including national litigation management and guidance risk mitigation.



## MARIA BONNER

**VP, Regulatory Compliance**

Policy and legal experience in both the public and private sectors provides deep understanding of regulatory policy.



## SAMANTHA EAKES

**VP, Regulatory Affairs**

More than seven years of FDA regulatory consulting experience and a diverse background in public health, public policy, and the nonprofit sector.



## MADELEINE GIAQUINTO

**Director, Regulatory Affairs**

Legal and policy expertise, with a robust portfolio of experience advising on FDA regulatory compliance for a range of product types.

## LITIGATION SUPPORT NETWORK

Greenleaf's litigation support capabilities include an outside network of experienced and knowledgeable FDA experts who were thoughtfully selected by Greenleaf and are adept at advising litigators representing FDA-regulated clients.



# LITIGATION SUPPORT SERVICES

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In legal actions involving FDA-regulated entities, complex FDA regulatory issues are often critical components of disputes.

Greenleaf's deep bench and network of experienced and knowledgeable FDA experts can advise litigators grappling with FDA regulatory issues and provide authoritative, objective expert opinions that may make a difference in how disputes are resolved. We can also serve in a consulting capacity to identify key FDA regulatory issues that may impact litigation strategy.

Greenleaf and our network of experts work closely with litigators representing FDA-regulated clients in a wide array of disputes related to medical devices, drug and biological products, and product quality, manufacturing, and compliance.

*Greenleaf is a regulatory consulting firm and does not provide legal advice or legal services.*



## EXTENSIVE KNOWLEDGE

Greenleaf and our network of experts can offer litigators a high-level institutional knowledge of the FDA as well as more granular expertise regarding FDA regulation of a variety of medical product types across the product lifecycle. Greenleaf's well-regarded professionals have spent decades working at the FDA in senior positions, allowing them to render thoughtful advice and authoritative opinions.



## TARGETED EXPERTISE

The Greenleaf team and network have extensive, in-depth expertise regarding medical product development and the premarket review process, as well as manufacturing, product quality and safety, compliance, and enforcement of all FDA-regulated products. Our experts have the knowledge, qualifications, and experience required to explain and clarify these and other issues to our clients, the courts, or juries and are credible, persuasive expert witnesses and litigation advisors.



## COMPREHENSIVE SERVICES

Greenleaf and our network have experience advising litigators on the nuances of FDA regulation, identifying key regulatory issues, preparing expert declarations or reports, and testifying during depositions and at trial. Greenleaf's team has worked with litigators engaged in a variety of disputes, including complex commercial litigation, unfair competition and false advertising cases, intellectual property litigation, product liability class actions, securities class actions, and other types of litigation, such as tax matters and contract disputes.

The logo for Greenleaf Health, featuring a stylized leaf icon to the left of the text "Greenleaf Health".

Greenleaf Health

A black and white photograph of four women sitting around a conference table in a meeting room. They are engaged in conversation. A semi-transparent green banner is overlaid across the middle of the image, containing the text "COSMETICS REGULATORY SERVICES".

# COSMETICS REGULATORY SERVICES

# COSMETICS REGULATORY SERVICES TEAM

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Greenleaf experts draw on decades of FDA and industry experience to provide best-in-class insight on all aspects of the FDA's regulation of cosmetics. Our wide-ranging expertise enables us to advise companies:

- entering the cosmetics space with limited FDA regulatory experience and/or knowledge;
- with existing products in the cosmetics space, that now need to interpret and comply with new FDA regulatory requirements under the Modernization of Cosmetics Regulation Act;
- marketing cannabis-derived consumer products (e.g., CBD-containing products) in the cosmetics space; and
- marketing novel products, such as innovative products or combination products that include a cosmetic with an over-the-counter drug or device, that are seeking assistance in complying with the most appropriate regulatory framework.



## JOHN TAYLOR

**President and Principal,  
Compliance & Regulatory Affairs**  
Former FDA senior official, acting in high-profile positions at the Agency and senior leadership roles within industry.

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## KALAH AUCHINCLOSS

**EVP, Regulatory Compliance**  
More than 15 years of experience on Capitol Hill, in the private sector, and at the FDA, including role as Deputy Chief of Staff.

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## LIZ OESTREICH

**SVP, Regulatory Compliance**  
Diverse background provides critical expertise within legal, public policy, regulatory advocacy, and non-profit sectors.

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## MADELEINE GIAQUINTO

**Director, Regulatory Affairs**  
Legal and policy expertise, with a robust portfolio of experience advising on FDA regulatory compliance for a range of product types.



## CYNTHIA SCHNEDAR

**Principal, Regulatory Compliance**  
30-year career as a compliance expert; formerly Director of the Office of Compliance for the FDA's Center for Drug Evaluation and Research (CDER).

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## MAURA NORDEN

**EVP, Medical Device &  
Combination Products**  
15 years of experience advising leading medical device and drug companies on FDA regulatory matters.

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## SAMANTHA EAKES

**VP, Regulatory Affairs**  
More than seven years of FDA regulatory consulting experience and a diverse background in public health, public policy, and the nonprofit sector.

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# COSMETICS REGULATORY SERVICES



Greenleaf provides guidance to cosmetics and aesthetic product manufacturers, beauty and personal care product companies, trade associations, and other stakeholders implementing and complying with FDA regulations and policies under the Federal Food, Drug, and Cosmetic (FD&C) Act, including new requirements stemming from the Modernization of Cosmetics Regulation Act (MoCRA), the Federal Fair Packaging and Labeling Act, and related statutes and regulations. Our services include:



## REGULATORY POLICY

Helping clients keep pace with, and better navigate, the emerging regulatory landscape

- Advising clients on new FDA rules and reports mandated by MoCRA and their underlying impact on the broader regulatory framework
- Providing regulatory intelligence gathering and supporting clients in developing and implementing regulatory policy capabilities and strategies to effectively advance their priorities
- Identifying opportunities for clients to engage with the FDA and other stakeholders and leverage alliances to influence regulatory policy



## REGULATORY STRATEGY & COMPLIANCE

Working with clients to clarify and support compliance with the regulatory requirements for consumer products marketed in the cosmetics space

- Providing guidance on FDA regulatory policies, programs, and procedures, including advising on the anticipated FDA jurisdictional determination for the product
- Advising on all aspects of MoCRA, including:
  - New marketing, facility registration, and product listing requirements
  - Small business accommodations under MoCRA
  - FDA's expanded enforcement authorities under MoCRA, and relevant FDA enforcement trends
- Providing compliance services, such as:
  - Helping clients understand applicable FDA manufacturing and quality controls, including GXP regulations for cosmetics
  - Conducting compliance assessments and gap analyses of manufacturing and quality practices and systems, and providing inspection readiness services
  - Assistance evaluating and responding to FDA communications related to enforcement actions and other regulatory correspondence
- Advising on FDA labeling requirements and product claims made on packaging and marketing materials
- Counseling on postmarket safety and reporting requirements

**OUR EXPERIENCE.**  
**YOUR SUCCESS.**